

EXHIBIT A



February 3, 2025

VIA ECF

Honorable Thomas I. Vanaskie
Special Master
Stevens & Lee
1500 Market Street, East Tower, Suite 1800
Philadelphia, Pennsylvania 19103-7360

**Re: *In re Valsartan, Losartan, and Irbesartan Liability Litigation*,
MDL 2875 RMB (D.N.J.)**

Dear Judge Vanaskie:

Pursuant to Special Master Order (Dkt. 2969), Plaintiffs are in agreement with Defendants that the Robert Lee case (Case No. 1:20-cv-19843) should be included in the Wave 2 bellwether trials. Plaintiff's counsel for the Robert Lee case has advised that the client will waive *Lexecon* and dismiss the Retailer Defendant. Plaintiff's counsel for the Robert Lee case will also submit a letter stating this.

Plaintiffs further agree with Defendants that Wave 2 should consist of four (4) cases total: Robert Garcia (Case No. 1:20-cv-07957), James Suits (Case No. 1:20-cv-06547), Evon Smalls (Case No. 1:20-cv-08199) and Robert Lee (Case No. 1:20-cv-19843).

The Parties are meeting and conferring on the Wave 2 case management schedule.

Respectfully Submitted,

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